I, Joanna Ardalan, declare as follows:

- 1. I am an attorney at law duly licensed to practice in this court and am a party to this case. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify as follows:
- 2. Attached as Exhibit A is a true and correct print screens of the "Who Is" information associated with lawintegral.com, trademarkintegral.com, and brandregistration.org. It shows that the registrar for each is NameCheap, Inc. and that the registrant has chosen to cloak its identity using "Withheld for Privacy ehf."
- 3. Attached as Exhibit B is a true and correct print screen of the "Who Is" information associated with deputytrademarks.com. It shows that the registrar is GoDaddy.com, Inc. and that the registrant has chosen to cloak its identity using Domains by Proxy, LLC.
- 4. I have visited the websites at issue in this lawsuit and understand that they use a feature called ZenDesk that provides an instant messenger feature. This feature permits customers to instantly type a message or question to an agent of Defendant and receive an instant response from Defendant.
- 5. I understand through my investigation that Defendants accepts American Express, Mastercard, Visa, and Discover. It also accepts Venmo and Paypal to process payment from its customers.
- 6. I understand that when Defendants file a trademark application, they first accept payment from the customer and then file the application using its own form of payment. Therefore, I believe the USPTO has information about the identity of Defendants.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11<sup>th</sup> day of December 2023, in Beverly Hills, California.

Case	8:23-cv-01243-KK-DFM	Document 23-1 #:202	Filed 12/11/23	Page 3 of 19	Page ID
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# EXHIBIT A

Register a .COM domain for only \$9.98! While stocks last!





Domains Hosting Servers Email Security Whois Deals

Enter Domain or IP



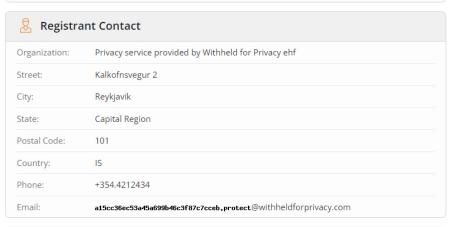


# lawintegral.com

Domain Information		
Domain:	lawintegral.com	
Registrar:	NameCheap, Inc.	
Registered On:	2022-07-19	
Expires On:	2024-07-19	
Updated On:	2023-06-19	
Status:	clientTransferProhibited	
Name Servers:	ns1.trademarkcanon.com ns2.trademarkcanon.com	

Updated 6 days ago 🗘	Interested in similar domains?
----------------------	--------------------------------

law-integral.com	Buy Now
lawyersintegral.com	Buy Now
lawintegralservices.com	Buy Now
familylawintegral.com	Buy Now
lawintegral.net	Buy Now
lawyersintegral.net	Buy Now









Administrative Contact		
Organization:	Privacy service provided by Withheld for Privacy ehf	
Street:	Kalkofnsvegur 2	
City:	Reykjavík	
State:	Capital Region	
Postal Code:	101	
Country:	IS	
Phone:	+354.4212434	
Email:	a15cc36ec53a45a699b46c3f87c7cceb.protect@withheldforprivacy.com	

Rechnical Contact			
Organization:	Organization: Privacy service provided by Withheld for Privacy ehf		
Street:	Kalkofnsvegur 2		
City:	Reykjavik		
State:	Capital Region		
Postal Code:	101		
Country:	IS		
Phone:	+354.4212434		
Email:	a15cc36ec53a45a699b46c3f87c7cceb.protect@withheldforprivacy.com		

#### **Raw Whois Data**

Domain name: lawintegral.com

Registrar WHOIS Server: whois.namecheap.com Registrar URL: http://www.namecheap.com Updated Date: 2023-06-19T06:18:31.65Z Creation Date: 2022-07-19T00:51:22.00Z

Registrar Registration Expiration Date: 2024-07-19T00:51:22.00Z

Registrar: NAMECHEAP INC Registrar IANA ID: 1068

Registrar Abuse Contact Email: abuse@namecheap.com Registrar Abuse Contact Phone: +1.9854014545

Reseller: NAMECHEAP INC

Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited

Registry Registrant ID:

Registrant Name: Redacted for Privacy

Registrant Organization: Privacy service provided by Withheld for Privacy ehf

Registrant Street: Kalkofnsvegur 2

Registrant City: Reykjavik

Registrant State/Province: Capital Region

Registrant Postal Code: 101 Registrant Country: IS Registrant Phone: +354.4212434 Registrant Phone Ext:

Registrant Fax: Registrant Fax Ext:

Registrant Email: a15cc36ec53a45a699b46c3f87c7cceb.protect@withheldforprivacy.com

Registry Admin ID:

Admin Name: Redacted for Privacy

Admin Organization: Privacy service provided by Withheld for Privacy ehf

Admin Street: Kalkofnsvegur 2

Admin City: Reykjavik

Admin State/Province: Capital Region

Admin Postal Code: 101 Admin Country: IS Admin Phone: +354.4212434 Admin Phone Ext:

Admin Fax: Admin Fax Ext:

 ${\tt Admin\ Email:\ a15cc36ec53a45a699b46c3f87c7cceb.protect@withheldforprivacy.com}$ 

Registry Tech ID:

Tech Name: Redacted for Privacy

Tech Organization: Privacy service provided by Withheld for Privacy ehf

Tech Street: Kalkofnsvegur 2 Tech City: Reykjavik

Tech State/Province: Capital Region

Tech Postal Code: 101 Tech Country: IS Tech Phone: +354.4212434 Tech Phone Ext:

Tech Fax: Tech Fax Ext:

Tech Email: a15cc36ec53a45a699b46c3f87c7cceb.protect@withheldforprivacy.com

Name Server: ns1.trademarkcanon.com Name Server: ns2.trademarkcanon.com

DNSSEC: unsigned

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

>>> Last update of WHOIS database: 2023-12-04T23:24:10.01Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

#### related domain names

namecheap.com icann.org trademarkcanon.com withheldforprivacy.com internic.net



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Case 8:23-cv-01243-KK-DFM Document 23-1 Filed 12/11/23 Page 7 of 19 Page ID

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1



Domains Hosting Servers Email Security Whois Deals

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### brandregistration.org

Domain Information		
Domain:	brandregistration.org	
Registrar:	NameCheap, Inc.	
Registered On:	2023-04-13	
Expires On:	2024-04-13	
Updated On:	2023-07-17	
Status:	clientHold clientTransferProhibited	
Name Servers:	ns1.trademarkcanon.com ns2.trademarkcanon.com	

### Registrant Contact

Organization:	Privacy service provided by Withheld for Privacy ehf
State:	Capital Region
Country:	IS

#### **Raw Whois Data**

Domain Name: brandregistration.org

Registry Domain ID: 09db48b7c4cd40a391f85475a8ceeb34-LROR

Registrar WHOIS Server: whois.namecheap.com Registrar URL: http://www.namecheap.com Undated Date: 2023-07-17T05:45:367 Creation Date: 2023-04-13T20:11:46Z Registry Expiry Date: 2024-04-13T20:11:46Z

Registrar: NameCheap, Inc. Registrar IANA ID: 1068

Registrar Abuse Contact Email: abuse@namecheap.com Registrar Abuse Contact Phone: +1.6613102107

Domain Status: clientHold https://icann.org/epp#clientHold

Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited

Registry Registrant ID: REDACTED FOR PRIVACY Registrant Name: REDACTED FOR PRIVACY

Registrant Organization: Privacy service provided by Withheld for Privacy ehf

Registrant Street: REDACTED FOR PRIVACY Registrant City: REDACTED FOR PRIVACY Registrant State/Province: Capital Region Registrant Postal Code: REDACTED FOR PRIVACY

Registrant Country: IS

Registrant Phone: REDACTED FOR PRIVACY Registrant Phone Ext: REDACTED FOR PRIVACY Registrant Fax: REDACTED FOR PRIVACY Registrant Fax Ext: REDACTED FOR PRIVACY

Registrant Email: Please query the RDDS service of the Registrar of Record identified in this out

Registry Admin ID: REDACTED FOR PRIVACY Admin Name: REDACTED FOR PRIVACY Admin Organization: REDACTED FOR PRIVACY Admin Street: REDACTED FOR PRIVACY Admin City: REDACTED FOR PRIVACY Admin State/Province: REDACTED FOR PRIVACY

Admin Postal Code: REDACTED FOR PRIVACY Admin Country: REDACTED FOR PRIVACY Admin Phone: REDACTED FOR PRIVACY Admin Phone Ext: REDACTED FOR PRIVACY Admin Fax: REDACTED FOR PRIVACY Admin Fax Ext: REDACTED FOR PRIVACY

Admin Email: Please query the RDDS service of the Registrar of Record identified in this output for

Registry Tech ID: REDACTED FOR PRIVACY

Tech Name: REDACTED FOR PRIVACY Tech Organization: REDACTED FOR PRIVACY Tech Street: REDACTED FOR PRIVACY Tech City: REDACTED FOR PRIVACY

Tech State/Province: REDACTED FOR PRIVACY Tech Postal Code: REDACTED FOR PRIVACY

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Tech Phone: REDACTED FOR PRIVACY
Tech Phone Ext: REDACTED FOR PRIVACY
Tech Fax: REDACTED FOR PRIVACY

Tech Fax Ext: REDACTED FOR PRIVACY
Tech Email: Please query the RDDS service of the Registrar of Record identified in this output fo

Name Server: ns1.trademarkcanon.com Name Server: ns2.trademarkcanon.com

DNSSEC: unsigned

URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/

>>> Last update of WHOIS database: 2023-12-11T23:15:23Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Terms of Use: Access to Public Interest Registry WHOIS information is provided to assist persons

4

#### related domain names

namecheap.com

icann.org

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Windows Reseller Hostin
Dedicated Servers
Cloud Hosting
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# trademarkintegral.com

Domain Information		
Domain:	trademarkintegral.com	
Registrar:	NameCheap, Inc.	
Registered On:	2023-03-21	
Expires On:	2024-03-21	
Updated On:	2023-07-17	
Status:	clientHold clientTransferProhibited	
Name Servers:	ns1.trademarkcanon.com ns2.trademarkcanon.com	

# trademark-integral.com trademarksintegral.com copyright integral.comtrademarkauxiliar.com trademarkintegral.net







#### Registrant Contact Organization: Privacy service provided by Withheld for Privacy ehf Street: Kalkofnsvegur 2 City: Reykjavik Capital Region State: Postal Code: 101 Country: IS +354.4212434 Phone: 73bcc4b5ae99477bba765917ae00ffbe.protect @ withheld for privacy.comEmail:

Administrative Contact		
Organization:	Privacy service provided by Withheld for Privacy ehf	
Street:	Kalkofnsvegur 2	
City:	Reykjavík	
State:	Capital Region	
Postal Code:	101	
Country:	IS	
Phone:	+354.4212434	
Email:	73bcc4b5ae99477bba765917ae88ffbe.protect@withheldforprivacy.com	

Rechnical Contact		
Organization:	Privacy service provided by Withheld for Privacy ehf	
Street:	Kalkofnsvegur 2	
City:	Reykjavík	
State:	Capital Region	
Postal Code:	101	
Country:	IS	
Phone:	+354.4212434	
Email:	73bcc4b5ae99477bba765917ae08ffbe.protect@withheldforprivacy.com	

#### **Raw Whois Data**

ID #:210 Registry Domain ID: 2766784832\_DOMAIN\_COM-VRSN Registrar WHOIS Server: whois.namecheap.com Registrar URL: http://www.namecheap.com Updated Date: 0001-01-01T00:00:00.00Z Creation Date: 2023-03-21T15:50:18.00Z Registrar Registration Expiration Date: 2024-03-21T15:50:18.00Z Registrar: NAMECHEAP INC Registrar IANA ID: 1068 Registrar Abuse Contact Email: abuse@namecheap.com Registrar Abuse Contact Phone: +1.9854014545 Reseller: NAMECHEAP INC Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited Domain Status: clientHold https://icann.org/epp#clientHold Registry Registrant ID: Registrant Name: Redacted for Privacy Registrant Organization: Privacy service provided by Withheld for Privacy ehf Registrant Street: Kalkofnsvegur 2 Registrant City: Reykjavik Registrant State/Province: Capital Region Registrant Postal Code: 101 Registrant Country: IS Registrant Phone: +354.4212434 Registrant Phone Ext: Registrant Fax: Registrant Fax Ext: Registrant Email: 73bcc4b5ae99477bba765917ae00ffbe.protect@withheldforprivacy.com Registry Admin ID: Admin Name: Redacted for Privacy Admin Organization: Privacy service provided by Withheld for Privacy ehf Admin Street: Kalkofnsvegur 2 Admin City: Reykjavik Admin State/Province: Capital Region Admin Postal Code: 101 Admin Country: IS Admin Phone: +354.4212434 Admin Phone Ext: Admin Fax: Admin Email: 73bcc4b5ae99477bba765917ae00ffbe.protect@withheldforprivacy.com Registry Tech ID: Tech Name: Redacted for Privacy Tech Organization: Privacy service provided by Withheld for Privacy ehf Tech Street: Kalkofnsvegur 2 Tech City: Reykjavik Tech State/Province: Capital Region Tech Postal Code: 101 Tech Country: IS Tech Phone: +354.4212434

#### related domain names

Name Server: ns1.trademarkcanon.com Name Server: ns2.trademarkcanon.com

namecheap.com icann.org trademarkcanon.com withheldforprivacy.com internic.net

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

For more information on Whois status codes, please visit https://icann.org/epp

Tech Email: 73bcc4b5ae99477bba765917ae00ffbe.protect@withheldforprivacy.com

>>> Last update of WHOIS database: 2023-12-11T11:18:21.00Z <<<



Tech Phone Ext: Tech Fax: Tech Fax Ext:

DNSSEC: unsigned

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w Domain Pricing WordPress Hosti
pis Lookup Linux Reseller Ho
ne Suggestion Tool Windows Reselle
w with Every Domain Dedicated Server

#### **Hosting & Product**

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Windows Hosting
WordPress Hosting
Linux Reseller Hosting
Windows Reseller Hosting
Dedicated Servers
Cloud Hosting
Website Builder

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Case 8:23-cv-01243-KK-DFM Document 23-1 Filed 12/11/23 Page 12 of 19 Page

CodeGuard

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Domains Hosting Servers Email Security Whois Deals

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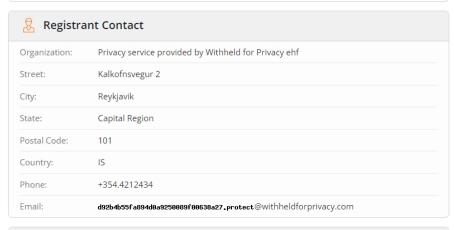


# deputytrademark.com

Domain Information		
Domain:	deputytrademark.com	
Registrar:	NameCheap, Inc.	
Registered On:	2022-04-29	
Expires On:	2024-04-29	
Updated On:	2023-07-17	
Status:	clientHold clientTransferProhibited	
Name Servers:	ns1-hydra.vivawebhost.com ns2-hydra.vivawebhost.com	



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deputytrademarks.net	Buy Now







Administrative Contact		
Organization:	Privacy service provided by Withheld for Privacy ehf	
Street:	Kalkofnsvegur 2	
City:	Reykjavík	
State:	Capital Region	
Postal Code:	101	
Country:	IS	
Phone:	+354.4212434	
Email:	${\tt d92b4b55fa894d8a9259889f88638a27.protect} @withheld for privacy.com$	



Rechnical Contact		
Organization:	Privacy service provided by Withheld for Privacy ehf	
Street:	Kalkofnsvegur 2	
City:	Reykjavík	
State:	Capital Region	
Postal Code:	101	
Country:	IS	
Phone:	+354.4212434	
Email:	d92b4b55fa894d0a9250089f00638a27.protect@withheldforprivacy.com	

#### **Raw Whois Data**

ID #:213 Registry Domain ID: 2692877692\_DOMAIN\_COM-VRSN Registrar WHOIS Server: whois.namecheap.com Registrar URL: http://www.namecheap.com Updated Date: 2023-03-30T06:25:33.31Z Creation Date: 2022-04-29T19:38:50.00Z Registrar Registration Expiration Date: 2024-04-29T19:38:50.00Z Registrar: NAMECHEAP INC Registrar IANA ID: 1068 Registrar Abuse Contact Email: abuse@namecheap.com Registrar Abuse Contact Phone: +1.9854014545 Reseller: NAMECHEAP INC Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited Domain Status: clientHold https://icann.org/epp#clientHold Registry Registrant ID: Registrant Name: Redacted for Privacy Registrant Organization: Privacy service provided by Withheld for Privacy ehf Registrant Street: Kalkofnsvegur 2 Registrant City: Reykjavik Registrant State/Province: Capital Region Registrant Postal Code: 101 Registrant Country: IS Registrant Phone: +354.4212434 Registrant Phone Ext: Registrant Fax: Registrant Fax Ext: Registrant Email: d92b4b55fa894d0a9250089f00638a27.protect @ withheldforprivacy.comRegistry Admin ID: Admin Name: Redacted for Privacy Admin Organization: Privacy service provided by Withheld for Privacy ehf Admin Street: Kalkofnsvegur 2 Admin City: Reykjavik Admin State/Province: Capital Region Admin Postal Code: 101 Admin Country: IS Admin Phone: +354.4212434 Admin Phone Ext: Admin Fax: Admin Email: d92b4b55fa894d0a9250089f00638a27.protect@withheldforprivacy.com Registry Tech ID: Tech Name: Redacted for Privacy Tech Organization: Privacy service provided by Withheld for Privacy ehf Tech Street: Kalkofnsvegur 2 Tech City: Reykjavik Tech State/Province: Capital Region Tech Postal Code: 101 Tech Country: IS Tech Phone: +354.4212434 Tech Phone Ext: Tech Fax: Tech Fax Ext: Tech Email: d92b4b55fa894d0a9250089f00638a27.protect@withheldforprivacy.com

#### related domain names

Name Server: ns1-hydra.vivawebhost.com Name Server: ns2-hvdra.vivawebhost.com

namecheap.com icann.org vivawebhost.com withheldforprivacy.com internic.net

URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/

For more information on Whois status codes, please visit https://icann.org/epp

>>> Last update of WHOIS database: 2023-12-11T03:39:48.76Z <<<



DNSSEC: unsigned





#### **Domains**

**Hosting & Product** 

#### Infrastructure

#### Support

Case 8:23-cv-01243-KK-DFM Document 23-1 Filed 12/11/23 Page 15 of 19 Page

CodeGua

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# **EXHIBIT B**





Domains Hosting Servers Email Security Whois Deals

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Enter Domain or IP





## deputytrademarks.com

Domain Information		
Domain:	deputytrademarks.com	
Registrar:	GoDaddy.com, LLC	
Registered On:	2023-07-17	
Expires On:	2024-07-17	
Updated On:	2023-07-17	
Status:	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited	
Name Servers:	ns1.trademarkcanon.com ns2.trademarkcanon.com	

Registrant Contact		
Name:	Registration Private	
Organization:	Domains By Proxy, LLC	
Street:	DomainsByProxy.com 2155 E Warner Rd	
City:	Tempe	
State:	Arizona	
Postal Code:	85284	
Country:	US	
Phone:	+1.4806242599	
Email:	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?domain=deputytrademarks.com	



a Technic	al Contact
Name:	Registration Private
Organization:	Domains By Proxy, LLC
Street:	DomainsByProxy.com 2155 E Warner Rd
City:	Tempe

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deputytrademarx.com	Buy Now
deputyjudgments.com	Buy Now
deputytrademarks.net	Buy Now
deputytrademark.net	Buy Now







State:	Arizona	ID #:217
Postal Code:	85284	
Country:	US	
Phone:	+1.4806242599	
Email:	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?domain=deputytrademarks.com	

```
Raw Whois Data
Domain Name: deputytrademarks.com
Registry Domain ID: 2798916950_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: https://www.godaddy.com
Updated Date: 2023-07-17T11:36:00Z
Creation Date: 2023-07-17T11:36:00Z
Registrar Registration Expiration Date: 2024-07-17T11:36:00Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Registry Registrant ID: Not Available From Registry
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 2155 E Warner Rd
Registrant City: Tempe
Registrant State/Province: Arizona
Registrant Postal Code: 85284
Registrant Country: US
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx
Registry Admin ID: Not Available From Registry
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 2155 E Warner Rd
Admin City: Tempe
Admin State/Province: Arizona
Admin Postal Code: 85284
Admin Country: US
Admin Phone: +1.4806242599
Admin Phone Ext:
Admin Fax Ext:
Admin Email: Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?doma
Registry Tech ID: Not Available From Registry
Tech Name: Registration Private
Tech Organization: Domains By Proxy, LLC
Tech Street: DomainsByProxy.com
Tech Street: 2155 E Warner Rd
Tech City: Tempe
Tech State/Province: Arizona
Tech Postal Code: 85284
Tech Country: US
Tech Phone: +1.4806242599
Tech Phone Ext:
Tech Fax:
Tech Email: Select Contact Domain Holder link at https://www.godaddv.com/whois/results.aspx?domai
Name Server: NS1.TRADEMARKCANON.COM
Name Server: NS2.TRADEMARKCANON.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2023-12-11T23:43:33Z <<<
For more information on Whois status codes, please visit https://icann.org/epp
TERMS OF USE: The data contained in this registrar's Whois database, while believed by the
registrar to be reliable, is provided "as is" with no guarantee or warranties regarding its
accuracy. This information is provided for the sole purpose of assisting you in obtaining
information about domain name registration records. Any use of this data for any other purpose
is expressly forbidden without the prior written permission of this registrar. By submitting
an inquiry, you agree to these terms and limitations of warranty. In particular, you agree not
```

to use this data to allow, enable, or otherwise support the dissemination or collection of this

#### 

postal mail, facsimile or other means of mass unsolicited, commentation of any kind, including spam. You further agree not to use this data to enable high volume, automator robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes. Failure to comply with these terms may result in termination of access to the Whois database. These terms may be subject to modificat any time without notice.

#### related domain names

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Linux Reseller Hosting
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Google Workspace
SSL Certificates
Sitelock
CodeGuard

#### Infrastructure

Datacenter Details
Hosting Security
24 x 7 Servers Monitoring

#### Support

View Knowledge Base Contact Support Report Abuse About Whois

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